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Oregon

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May 18, 2001

Mr. Pad Quinn
Port of Portland
P.O. Box 3529
Portland, Oregon 97208

Re: Terminal 1 Preliminary Assessment
2200 NW Front Avenue, Portland, Oregon
Portland Harbor Marine Terminal Sites

Dear Pad:

The Oregon Department of Environmental Quality (DEQ) reviewed the September 7, 2000 Terminal 1 (T1) Preliminary Assessment (PA) submitted by the Port of Portland, and has the comments described below. The DEQ appreciates the submittal of additional information as requested in our May 1, 2000 letter concerning the initial PA submitted in March 2000. The primary objective of the PA was to determine whether current or historic operations at the site may have resulted in a release of hazardous substances and whether that release may have contributed to contamination in Portland Harbor.

The southern portion of T1 is currently being investigated through DEQ's Voluntary Cleanup Program. Therefore, this PA review does not elaborate on the on-going investigation of the upland portion of T1-South. However, sediment data adjacent to the entire T1 site was reviewed for indications of potential impact by the upland areas. DEQ comments presented below on the upland portion of T1 focus on T1-North.

General

- In the third paragraph of Section 2.1, the text should be corrected to state that one of the three city outfalls discharges at the south end of the terminal.
- Several references to the Appendices are incorrect.

T1-North

- The PA describes the activities of Western Transportation in Section 3.0, but the historical and current use of the site (before and after Western Transportation) and associated waste management practices are not clear. In addition, the "resolution" of potential environmental concerns described in the Port's 1996 environmental update (including two heating oil tanks) should be described in more detail.

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- It appears that Warehouse 4 on the south side of Front Ave. was not included in the PA's evaluation. Please provide documentation on the historical and current use and waste management practices related to this building.

T1-South

- Portions of the May 15, 2000 report included in Appendix F are missing. However, this document was reviewed from another copy previously submitted to the DEQ.

Sediment Investigations

- Sample locations, depths, and sampling techniques for the 1991 sediment sample data provided in Appendix G should be described. Sediment data showed that concentrations of phenol, bis(2-ethylhexyl)phthalate, and di-n-butylphthalate exceeded baseline levels determined from the 1998 Portland Harbor Sediment Investigation conducted by Roy F. Weston, Inc. for the U.S. EPA. The DEQ uses these Portland Harbor baseline concentrations to determine if sediment data indicates a potential contribution from adjacent upland facilities.
- Results from sediment samples collected during 1996 and 2000 investigations generally shows concentrations below Portland Harbor baseline concentrations.

Other Investigations

Petroleum contamination was observed during drilling of a geotechnical investigative boring for the City of Portland's West Side CSO Tunnel project. The three-foot diameter boring was located in the northwest corner of T1-North (adjacent to NW Front Avenue) and was drilled between March 2 and 5, 2001 to a depth of 62 feet below ground surface (bgs). Weathered diesel product was observed in soil at the water table at 27 feet bgs and in a one-inch layer of product floating on the water surface within the borehole. Soil samples collected for laboratory analysis showed elevated concentrations of diesel and oil-range petroleum hydrocarbons at 27 and 33 feet bgs; metals were detected at low levels and polychlorinated biphenyls (PCBs) were not detected in that interval. Soil samples from 6 and 17 feet bgs showed no detectable total petroleum hydrocarbons or PCBs, and metals were detected at low levels except for elevated concentrations of lead that are below US EPA residential preliminary remediation goals. Groundwater was analyzed for volatile organic compounds and only trace levels of trichloroethene and 1,1-dichloroethane were observed. The source of soil and groundwater contamination at this geotechnical boring has not been determined.

Conclusions

From the sediment data included in the PA, there does not appear to be significant sediment contamination adjacent to the T1 facility. Four maintenance dredgings between 1980 and 1996



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may have favorably impacted adjacent sediment quality. Although there is no existing evidence that the subject site is a current source of contamination to the Willamette River, the newly discovered petroleum contamination in the northwest corner of the site must be further investigated.

DEQ comments on the T1 PA, further investigation into the source and extent of contamination recently observed in the geotechnical boring, and completion of investigation/remediation of T1-South must be resolved before a final determination on this site by DEQ is made (both as a potential Portland Harbor contaminant source and for "no further action" requirements). Please provide me with a written response to these comments within 30 days of receipt.

Please call me if you have any questions.

Sincerely,



Tom Gainer, P.E.
Project Manager
Voluntary Cleanup/Portland Harbor

cc: Joe Mollusky, Port
Eric Blischke, DEQ/NWR
Rod Struck, DEQ/NWR



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